

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

Case No. 2:23-CV-00352-JRG-RSP

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS and VERIZON CORPORATE
SERVICES GROUP, INC.,

Defendants.

DEFENDANTS' AMENDED WITNESS LIST

Defendants Cellco Partnership d/b/a Verizon Wireless and Verizon Corporate Services Group Inc. (collectively, “Verizon” or “Defendants”) provide the following amended list of witnesses that they presently anticipate they may or will call in this Action.

Defendants reserve all rights to call any witnesses that Plaintiff Headwater Research LLC (“Headwater” or “Plaintiff”) identifies on its witness list and/or calls at trial, any witnesses for the purposes of impeachment or rebuttal, and any witnesses for whom Defendants have provided deposition designations (whether initial, counter, or reply designations). The topics of testimony set forth below are intended as general descriptions and are not intended to be limiting or exhaustive. In addition, Defendants identify as a topic of testimony for each witness any document that the witness authored or received, for which the witness is a custodian, or in which the author is cited.

Defendants expressly reserve the right to revise or supplement this amended witness list. Where Defendants have indicated they will call or may call a witness, Defendants intend for that witness to testify either in person at trial or by deposition.

At this time, Defendants identify the following witnesses for trial:

WITNESS, employer, topic of testimony	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
Dr. Kevin Jeffay, University of North Carolina, Chapel Hill Infringement, validity, technical value of the '541 and '613 Patents, as described in witness's Rule 26(a)(2)(B) report.	X		
Dr. Benjamin Goldberg, New York University		X	

WITNESS, employer, topic of testimony	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
Functionality and operation of allegedly infringing source code, as described in witness's Rule 26(a)(2)(B) report.			
Dr. Thomas Hazlett, Clemson University Economic analysis and damages, as described in witness's Rule 26(a)(2)(B) report.		X	
Mr. Mark Lanning, Telecom Architects, Inc. Infringement, validity, technical value of the '042 Patent, as described in witness's Rule 26(a)(2)(B) report.			X
Laura Stamm, Analysis Group Economic analysis and damages, as described in witness's Rule 26(a)(2)(B) report.		X	
Sarah Butler, National Economics Research Associates Economic and consumer research, as described in witness's Rule 26(a)(2)(B) report.		X	
Ed Diaz, Verizon Historical issues relating to Verizon's interactions and dealings with ItsOn and/or Headwater.		X	
Neer Gupta, Verizon		X	

WITNESS, employer, topic of testimony	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
Verizon's IP licensing and historical issues relating to Verizon's interactions and dealings with ItsOn and/or Headwater.			
Tammy Hooker, Verizon Financial data related to the accused instrumentalities			X
David Iannotte, Verizon Marketing of the accused instrumentalities.			X
Mike Kondratiuk, Verizon Operation and design of the accused instrumentalities.			X
Kyle Malady, Verizon Historical issues relating to Verizon's interactions and dealings with ItsOn and/or Headwater.		X	
Steven Rice, Verizon Verizon and its business operations, including its business units and its products and services, and operation and design of the accused instrumentalities.	X		
Sid Sibal, Verizon Operation and design of the accused instrumentalities.		X	
Kartik Umamaheswaran, Verizon Operation and design of the accused instrumentalities.		X	

WITNESS, employer, topic of testimony	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
John Doherty, former Verizon employee Historical issues relating to Verizon's interactions and dealings with ItsOn and/or Headwater.		X	
Nem Kashanian, former Verizon consultant Historical issues relating to Verizon's interactions and dealings with ItsOn and/or Headwater.		X	
Ed Ruth, former Verizon employee Historical issues relating to Verizon's interactions and dealings with ItsOn and/or Headwater.		X	
Jude Munn, current Verizon employee Historical issues relating to Verizon's interactions and dealings with ItsOn and/or Headwater.		X	
Louis Chan-Lizardo, former Verizon employee Historical issues relating to Verizon's interactions and dealings with ItsOn and/or Headwater.			X
Venkat Gaddam, former Verizon employee Historical issues relating to Verizon's interactions and dealings with ItsOn and/or Headwater.		X	
Barry Hoffner, former Verizon employee			X

WITNESS, employer, topic of testimony	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
Historical issues relating to Verizon's interactions and dealings with ItsOn and/or Headwater.			
Jonathan Hinz, former Verizon employee Historical issues relating to Verizon's interactions and dealings with ItsOn and/or Headwater.			X
Nathan Begeman, Apple Information related to the accused instrumentalities and prior art.			X
David Chan, Apple Information related to the accused instrumentalities and prior art.			X
Jeffrey Sharkey, former Google Information related to the accused instrumentalities and prior art.		X	
Hannah Sifuentes, T-Mobile Operation and function of the accused instrumentalities and the Sprint ItsOn product.		X	
Kartik Venkatraman, Apple Information related to the accused instrumentalities and prior art.		X	
Amith Yamasani, Google Information related to the accused instrumentalities and prior art.		X	

WITNESS, employer, topic of testimony	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
<p>Headwater Research LLC</p> <p>Alleged invention and patenting of the Asserted Patents; ownership of the Asserted Patents; operation of Headwater and any affiliated entities; the conception, reduction to practice, inventorship, commercialization, or disclosure of any alleged invention in the Asserted Patents or any embodiments thereof; analyses of or concerning the Asserted Patents; licensing of the Asserted Patents and any related or comparable patents; factual basis of Headwater's claims; and settlements, licenses, and other financial interests in the Asserted Patents and/or litigation related to the Asserted Patents.</p>	X		
<p>Farshad Farjami, prosecuting attorney</p> <p>Prosecution of the asserted patents.</p>			X
<p>Jeffrey Green, inventor</p> <p>Alleged invention and patenting of the Asserted Patents; ownership of the Asserted Patents; the conception, reduction to practice, inventorship, commercialization, or disclosure of any alleged invention in Asserted Patents or any embodiments thereof; prior art to the Asserted Patents; analyses of or concerning the Asserted Patents; licensing of the Asserted Patents and any related or comparable patents; factual basis of Headwaters's claims; and settlements, licenses, and other financial interests in the Asserted Patents</p>			X

WITNESS, employer, topic of testimony	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
James Harris, former Headwater employee Information related to Headwater and ItsOn.		X	
Krista Jacobsen, former Headwater employee Prosecution of the asserted patents; historical issues relating to Verizon's interactions and dealings with ItsOn and/or Headwater.		X	
Justin James, inventor Alleged invention and patenting of the Asserted Patents; ownership of the Asserted Patents; the conception, reduction to practice, inventorship, commercialization, or disclosure of any alleged invention in Asserted Patents or any embodiments thereof; prior art to the Asserted Patents; analyses of or concerning the Asserted Patents; licensing of the Asserted Patents and any related or comparable patents; factual basis of Headwaters's claims; and settlements, licenses, and other financial interests in the Asserted Patents			X
David Johnson, former Headwater employee Historical issues relating to Verizon's interactions and dealings with ItsOn and/or Headwater.		X \\	
James Lavine, inventor and current Headwater consultant		X	

WITNESS, employer, topic of testimony	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
<p>Alleged invention and patenting of the Asserted Patents; ownership of the Asserted Patents; the conception, reduction to practice, inventorship, commercialization, or disclosure of any alleged invention in Asserted Patents or any embodiments thereof; prior art to the Asserted Patents; analyses of or concerning the Asserted Patents; licensing of the Asserted Patents and any related or comparable patents; factual basis of Headwaters's claims; and settlements, licenses, and other financial interests in the Asserted Patents</p>			
<p>Gregory Raleigh, current Headwater lead director</p> <p>Alleged invention and patenting of the Asserted Patents; ownership of the Asserted Patents; the conception, reduction to practice, inventorship, commercialization, or disclosure of any alleged invention in Asserted Patents or any embodiments thereof; prior art to the Asserted Patents; analyses of or concerning the Asserted Patents; licensing of the Asserted Patents and any related or comparable patents; factual basis of Headwaters's claims; and settlements, licenses, and other financial interests in the Asserted Patents</p>	X		
<p>Alireza Raissinia, inventor</p> <p>Alleged invention and patenting of the Asserted Patents; ownership of the Asserted Patents; the conception, reduction to practice, inventorship, commercialization, or disclosure of any</p>		X	

WITNESS, employer, topic of testimony	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
alleged invention in Asserted Patents or any embodiments thereof; prior art to the Asserted Patents; analyses of or concerning the Asserted Patents; licensing of the Asserted Patents and any related or comparable patents; factual basis of Headwaters's claims; and settlements, licenses, and other financial interests in the Asserted Patents			
Jennifer Smith, current Headwater employee Headwater's business.			X
James Straight, former Headwater consultant Historical issues relating to Verizon's interactions and dealings with ItsOn and/or Headwater.		X	
Any witness included on Headwater's witness list.		X	
Paul Brown, UX Connect Information related to Samsung and Strategy Analytics.		X, live or by deposition	

Dated: June 16, 2025

By: /s/ Josh Krevitt

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served via electronic mail to all opposing counsel of record on June 16, 2025.

/s/ Josh Krevitt
Josh Krevitt